

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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YOLMA HAYLETT and KENNETH  
EASTMOND,

Plaintiffs,

-against-

CITY OF NEW YORK; Correction Officer  
BRUCE SUTTON; and JOHN and JANE DOE 1  
through 10, individually and in their official  
capacities (the names John and Jane Doe being  
fictitious, as the true names are presently  
unknown),

Defendants.  
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**DECLARATION OF  
GABRIEL P. HARVIS IN  
SUPPORT OF REQUEST  
FOR CERTIFICATE OF  
DEFAULT**

15 CV 223 (WFK) (PK)

Gabriel P. Harvis, an attorney duly admitted to practice before this Court,  
hereby declares the following, under penalty of perjury:

1. I am the attorney for plaintiffs in this action.
2. This action was commenced by the filing of a complaint on January 15, 2015.
3. The time for defendant Bruce Sutton to answer or otherwise move with respect to the complaint herein has expired.
4. Defendant Sutton has not answered or otherwise moved with respect to the complaint, and the time for defendant Sutton to answer or otherwise move has not been extended.
5. Defendant Sutton is not an infant or incompetent. Defendant Sutton is not presently in the military service of the United States as appears from facts in this litigation.

6. Defendant Sutton is indebted to plaintiffs Yolma Haylett and Kenneth Eastmond for the reasons detailed in the complaint, including for having falsely imprisoned and assaulted them on June 26, 2014.

WHEREFORE, plaintiffs Yolma Haylett and Kenneth Eastmond request that the default of defendant Bruce Sutton be noted and a certificate of default be issued.

Dated: May 3, 2016  
New York, New York

HARVIS & FETT LLP



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Gabriel P. Harvis  
305 Broadway, 14th Floor  
New York, New York 10007  
(212) 323-6880  
gharvis@civilrights.nyc  
*Attorneys for plaintiffs*